

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

IRAN NOTICE OF  
AMENDMENT

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This document relates to: Ashton et al v. al Qaeda Islamic Army, et al.,

No. 02-CV-6977(GBD)(SN).

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 3237, as permitted and approved by the Court's Order of July 10, 2018, ECF No. 4045. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in

connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

### CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☒ Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237
- ☐ Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

### IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	<b>Plaintiff's Name (alphabetical by last name)</b>	<b>Plaintiff's State of Residency at filing (or death)</b>	<b>New Plaintiff's Citizenship/Nationality on 9/11/2001</b>	<b>9/11 Decedent's Name</b>	<b>New Plaintiff's Relationship to 9/11 Decedent</b>	<b>Paragraphs of Complaint Discussing 9/11 Decedent</b>
1	Braca, Christopher	NJ	USA	Braca, Alfred	Child	N/A
2	Burke, Brian	NY	USA	Burke, Thomas	Child	N/A
3	Burke, Chris	NY	USA	Burke, Thomas	Sibling	N/A
4	Burke, George	NY	USA	Burke, Thomas	Child	N/A
5	Burke, John	NY	USA	Burke, Thomas	Child	N/A
6	Burke, Thomas	NY	USA	Burke, Thomas	Child	N/A
7	Carroll, Eleanor	NY	USA	Carroll, Michael	Personal Representative of the Estate of William Carroll, deceased Parent of 9/11 Decedent Michael Carroll	N/A
8	Ehrlich, Myles	NY	USA	Orfi-Ehrlich, Lisa	Child	N/A
9	Ehrlich, Ryan	NJ	USA	Orfi-Ehrlich, Lisa	Child	N/A
10	Fregonese, Lauren	NY	USA	Ill, Jr., Frederick	Child	N/A
11	Hagerty, Dianne	MD	USA	Scauso, Dennis	Sibling	N/A

	<b>Plaintiff's Name (alphabetical by last name)</b>	<b>Plaintiff's State of Residency at filing (or death)</b>	<b>New Plaintiff's Citizenship/Nationality on 9/11/2001</b>	<b>9/11 Decedent's Name</b>	<b>New Plaintiff's Relationship to 9/11 Decedent</b>	<b>Paragraphs of Complaint Discussing 9/11 Decedent</b>
12	Higley, Rachael	LA	USA	Higley, Robert	Sibling	N/A
13	Ill, III, Frederick	NY	USA	Ill, Jr., Frederick	Child	N/A
14	Kane, Jennifer	NY	USA	Ill, Jr., Frederick	Child	N/A
15	Regan, James	WV	USA	Regan, Donald	Child	N/A
16	Regan, Jill	NY	USA	Regan, Donald	Child	N/A
17	Regan, Peter	NY	USA	Regan, Donald	Child	N/A
18	Shakouri, Nancy	NY	USA	Scauso, Dennis	Sibling	N/A
19	Sivin, Justin	NC	USA	Miller, Joel	Stepchild	N/A
20	Sivin, Maxwell	NY	USA	Miller, Joel	Stepchild	N/A
21	Sweeney, Elena	MD	USA	Scauso, Dennis	Sibling	N/A
22	Weinstein, Andrew	MO	USA	Orfi-Ehrlich, Lisa	Sibling	N/A
23	Weinstein, Seth	NY	USA	Orfi-Ehrlich, Lisa	Sibling	N/A
24	Weinstein, Stanley	NY	USA	Orfi-Ehrlich, Lisa	Personal Representative of the Estate of Gloria Weinstein, deceased Parent of 9/11 Decedent Lisa Orfi-Enrich	N/A

Dated: January 2, 2020

Respectfully submitted,

KREINDLER &amp; KREINDLER LLP

BY: /s/ James P. Kreindler  
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